

SUPPLEMENTING COLORADO'S EHB BENCHMARK PLAN OPTIONS TO INCLUDE PEDIATRIC DENTAL BENEFITS

Background

The Affordable Care Act lists pediatric services, including dental care, as one of the ten essential health benefits (EHB) that must be included in most insurance plans starting in 2014.¹ In a December 2011 bulletin, the U.S. Department of Health and Human Services (HHS) acknowledged that small group coverage generally did not include pediatric dental, and state employee coverage in this category varies from state-to-state.

In Colorado, six of the nine EHB benchmark options do not currently include pediatric dental. If one of these six plans is selected as the state's benchmark, Colorado will have to supplement the benchmark to ensure coverage of pediatric dental, and our two options are discussed below. In contrast, the three Federal employee plans among Colorado's EHB benchmark options already include pediatric dental benefits. If one of these plans is selected as Colorado's EHB benchmark, it will not need to be supplemented by the method described below.

HHS has outlined two options for states to incorporate pediatric dental benefits into a state EHB benchmark plan that does not currently offer this coverage, as follows:

1. A state can select the dental benefit package offered through the state's Children's Health Insurance Program (CHIP) plan.² Colorado's CHIP program is called Child Health Plan *Plus* (CHP+), and the dental portion is comprised of three plans that offer the same benefits package.³
2. A state can select the benefit package offered through the Federal Employees Dental and Vision Insurance Program (FEDVIP) plan with the largest national enrollment, which is the plan administered by MetLife^{4 5}

As with other categories of EHBs, a state must adopt one of these options in full and may not alter or add to the benefits for purposes of the state's EHB package.

Comparison of Benefits

Both the CHP+ and FEDVIP plans cover many basic dental services, including cleanings, oral exams, x-rays, sealants, amalgam (metal) cavity fillings, and composite (resin) cavity fillings for front teeth.⁶ In some areas, plan benefits are very similar, although not identical. For example, CHP+ limits diagnostic and preventative procedures, including oral exams, to two in a 12-month period. Similarly, FEDVIP limits this type of procedure to one in a 6-month period.

However, as services become more complex, coverage tends to diverge among the plans. For example, because the FEDVIP benefits package is designed for both children and adults, it covers a wider array of services typically necessary for an adult population. In contrast, the CHP+ benefit package was designed for children 18 and under and for pregnant women, as these are the populations CHP+ presently serves.

Pediatric Age

To date, HHS has not defined a specific age at which coverage provided under the "pediatric services" EHB category. Thus, a state may need to determine the age range to which pediatric dental benefits apply. Colorado Medicaid and CHP+ currently provide benefits to children ages 18 and under. However, this age limit may not be relevant to pediatric dental benefits, and other ages may be considered.

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Public Comments

The Governor's Office, the Colorado Division of Insurance, and the Colorado Health Benefit Exchange seek comment on the following questions:

- Which of the HHS options regarding pediatric dental benefits should Colorado select and why?
- If the state elects one of the six plans in which pediatric dental is not covered, should Colorado supplement the EHB benchmark with benefits from CHP+ or from FEDVIP? Why?
- How do these decisions impact the selection of an EHB benchmark option? Which EHB benchmark option should be selected given the commenting entity's priorities?

¹ "Essential Health Benefits Bulletin," Center for Consumer Information and Insurance Oversight, U.S. Department of Health & Human Services

<http://cciio.cms.gov/resources/files/Files2/12162011/essential_health_benefits_bulletin.pdf> 16 Dec. 2011.

² "Essential Health Benefits Bulletin," Center for Consumer Information and Insurance Oversight, U.S. Department of Health & Human Services

<http://cciio.cms.gov/resources/files/Files2/12162011/essential_health_benefits_bulletin.pdf> 16 Dec. 2011.

³ "Child Health Plan Plus (CHP+) Dental Program, Evidence of Coverage (EOC), Group 6901 and 6903"

<http://www.deltadentalco.com/uploadedFiles/About/CHP6901_6903.pdf> 1 Jul. 2007. Also "Child Health Plan Plus (CHP+) Dental Program, Evidence of Coverage (EOC), Group 6902 and 6904"

<http://www.deltadentalco.com/uploadedFiles/About/CHP6902_6904.pdf> 1 Jul. 2007. Also "Child Health Plan Plus (CHP+) Dental Program, Evidence of Coverage (EOC), Group 9676 and 9677"

<http://www.deltadentalco.com/uploadedFiles/About/CHP9676_9677.pdf> 1 Sept. 2010.

⁴ "Essential Health Benefits Bulletin," Center for Consumer Information and Insurance Oversight, U.S. Department of Health & Human Services

<http://cciio.cms.gov/resources/files/Files2/12162011/essential_health_benefits_bulletin.pdf> 16 Dec. 2011.

⁵ "The MetLife Federal Dental Plan" <<http://www.opm.gov/insure/health/planinfo/2012/brochures/MetLife.pdf>> 2012.

⁶ "The MetLife Federal Dental Plan" <<http://www.opm.gov/insure/health/planinfo/2012/brochures/MetLife.pdf>>

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<http://www.deltadentalco.com/uploadedFiles/About/CHP6901_6903.pdf> 1 Jul. 2007. Also "Child Health Plan Plus (CHP+) Dental Program, Evidence of Coverage (EOC), Group 6902 and 6904"

<http://www.deltadentalco.com/uploadedFiles/About/CHP6902_6904.pdf> 1 Jul. 2007. Also "Child Health Plan Plus (CHP+) Dental Program, Evidence of Coverage (EOC), Group 9676 and 9677"

<http://www.deltadentalco.com/uploadedFiles/About/CHP9676_9677.pdf> 1 Sept. 2010.